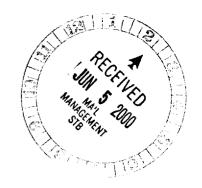
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## BEFORE THE SURFACE TRANSPORTATION BOARD

EX PARTE No. 582 (Sub. No. 1)



#### MAJOR RAIL CONSOLIDATION PROCEDURES

# NOTICE OF FILING OF ORIGINALS OF STATEMENTS IN SUPPORT OF COMMENTS OF THE RAIL LABOR DIVISION TRANSPORTATION TRADES DEPARTMENT, AFL-CIO

In filing its comments in this proceeding, the TTD Rail Division noted that time constraints had prevented the filing of a signed statement of Pat Brannan that was offered in support of the RLD's comments, so a copy that was not original signed version of the Brannan Declaration, but which had been authorized by the witness was submitted. The RLD is now herewith filing the original of the Declaration of Pat Brannan.

ENTERED
Office of the Socrotary

JUN 05 2000

Respectfully submitted,

Part of Public Record

Rail Labor Division Transportation Trades Department, AFL-CIO

Donald C. Buchanan

Chair, Rail Labor Division, TTD

Richard S. Edelman Donald F. Griffin Mitchell M. Kraus Harold A. Ross Michael S. Wolly

Dated: June 5, 2000

#### CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Notice of Filing of Originals of Statements in Support of Comments of the Rail Labor Division of the Transportation Trades Department of the AFL-CIO were this day served by First Class Mail upon all parties of record so designated on the official service lists compiled and published by the Board.

Date: June 5, 2000

Richard S. Edelman

### BEFORE THE SURFACE TRANSPORTATION BOARD WASHINGTON, D.C.

STB Ex Parte No. 582 (Sub-No. 1)

MAJOR RAIL CONSOLIDATION PROCEDURES

#### DECLARATION OF PAT BRANNAN

\_\_\_\_\_

- 1. I am an employee of the Norfolk Southern Railroad, with approximately twenty-six (26) years of rail seniority and was employed by Conrail prior to its 1998 acquisition by NS and CSX.

  I work in the clerical craft and class.
- I am married to another rail clerk and, prior to 1999,
   we both resided in the Pittsburgh area.
- 3. Before December of 1999, I worked in Conrail's National Customer Service Center in Pittsburgh. When NS eliminated my position in Pittsburgh, I elected to bid on a position in Waynesburg, Pennsylvania, in order to preserve my employment within a reasonable distance of my wife. Following NS' transfer of work from the Pittsburgh area generally, I was bumped from my position in Waynesburg due to abolishments which occurred in Conway, Pennsylvania in January of 2000, and had to displace onto a position at Toledo, Ohio, the closest available position in my seniority district.

4. Clerical forces were subsequently relocated from Toledo to the Customer Service Center in Atlanta and, because I lacked sufficient seniority to hold one of the remaining positions in Toledo, was forced to either resign and forfeit my quarter century of seniority, go onto unprotected furloughed status, or relocate to Atlanta. I chose to protect my seniority and my protected status by accepting a position in Atlanta. My wife and I have remained geographically separated ever since - she still works in Pittsburgh, while I work in Atlanta, which has seriously damaged my relationship with my wife, which will likely result in divorce.

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I declare under penalty of perjury that the foregoing is true and correct. Executed this  $1 \over 2$  day of May, 2000.

PAT BRANNAN

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